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EX PARTE

March 22, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

RE: CC Docket No. 95-116 - Number Portability

Dear Mr. Caton,

This letter is in response to a verbal inquiry from Matt Harthun of the Common Carrier Bureau. Following is a restatement of Mr. Harthun's questions and Sprint Corporation's responses:

1. What are the incremental costs of providing service provider number portability through RCF? Through DID?

A. Include a diagram identifying the cost components and the amount of each component. For example: termination costs or their equivalents; feature activation costs or their equivalents; call reorigination costs or their equivalents; transport costs; tandem switching costs; and any other operational costs.

Response: Attachment A is a diagram which depicts an average direct cost view of Remote Call Forwarding (RCF). Sprint's preliminary analysis indicates a monthly cost for providing RCF in a range of \$0.26 to \$3.09 depending on the type of central office switching equipment used. This cost represents feature switching and software cost for the remote call forwarding functionality only. Sprint has not identified ancillary costs such as termination, transport, administrative or joint and common costs associated with service provider number portability through RCF. Due to proprietary purchase agreements with central office switching manufacturers, Sprint

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will not divulge individual cost components or detailed diagrams of associated central switching components.

Sprint has not performed cost analysis for the DID functionality.

B. State whether or how incremental costs vary for intraoffice calls and interoffice calls. By intraoffice calls, calls which originate on the same switch from which the dialed number was ported; interoffice calls are calls which originate on a different switch from which the dialed call was ported.

Response: See 1 A. above. Sprint has not identified costs associated with termination or transport.

C. Indicate the average number of ported calls in each situation (intraoffice and interoffice) on a monthly basis.

Response: Sprint has not made demand projections of service provider number portability through RCF. At this time, Sprint local telephone companies have not received customer requests for number portability through RCF.

2. What are the administrative costs of providing number portability through RCF and DID? Identify and itemize the nature and amount of billing, record keeping, service fees, charges for initiating interim measure.

Response: Sprint has not identified the administrative costs of providing number portability through RCF. The monthly costs in the range of \$0.26 to \$3.09 are the average direct costs for the RCF feature only.

3. Identify any costs not in 1. or 2. above. Itemize amount of each and how each cost is incurred.

Response: Sprint recognizes that costs beyond average direct will be involved in the provisioning of RCF, however, analysis is pending on these additional costs and is not complete.

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4. Do the quantity of ported numbers or the quantity of calls to ported numbers affect the costs of providing number portability through RCF or DID? If yes, explain in detail the cost relationship between these costs and the underlying costs of providing DID and RCF. For example, for each 1000 calls to ported numbers, the transport cost increases by _____. Do this for each cost component.

Response: The quantity of calls to ported numbers increases the cost of providing number portability through RCF. This additional cost is reflected in a cost element called "Call Path." Call Path allows for additional activity beyond an average of three calls during the busy hour and is reflected in Sprint's RCF costs. The cost for additional call paths range from \$0.16 to \$0.49 depending upon the technology mix.

Below is additional information associated with providing number portability through RCF:

- RCF, when used for number portability, is a different service than the currently offered Remote Call Forwarding feature that is tariffed for end users. the end user RCF allows customers to program, from their phones, the telephone number they would like to forward their assigned telephone number to (i.e., John Doe customer goes to a friend's house and forwards his home number to his friend's to receive calls). End user access is not allowed for RCF, the switch service, when used for number portability. RCF, the switch service, is "remote" in terms of fixed forwarding to another central office.
- Two telephone numbers are required: 1) the customer's existing number with the incumbent LEC, and 2) the number assigned to the customer by the CLEC which is the physical address where the incumbent LEC will forward incoming calls.

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- Each terminating call to a CLEC's customer results in two separate calls: 1) the first call from the originating party to the incumbent LEC, and 2) the second call from the incumbent LEC to the CLEC which can be local or toll.
- Sprint favors the use of RCF in providing service provider number portability, however, remote call forwarding will cause a slight increase in call set-up time.

If you have any questions, please feel free to call.

Sincerely,

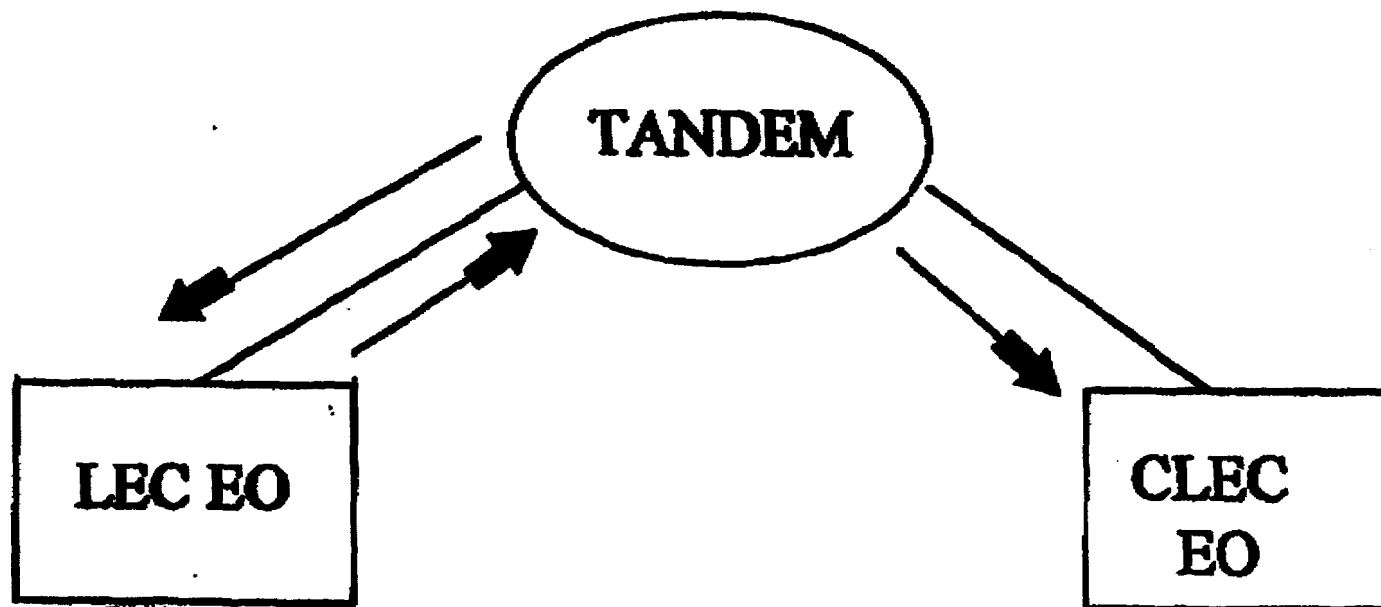
A handwritten signature in black ink, appearing to read "Warren D. Hannah". The signature is fluid and cursive, with the first name "Warren" being more prominent.

Warren D. Hannah

Attachment

cc: Matt Harthun, FCC
Susan McMasters, FCC
Mark Askins, Sprint
Marcheta Maatsch, Sprint
Bill Bollinger, Sprint

REMOTE CALL FORWARDING



Memory
Processor
Call
Line Card

Total LEC Switching Related Cost Range- \$0.26 to \$3.09

The above Remote Call Forwarding cost does not include termination cost, transport cost or tandem switching cost as these functions will be recovered through component unbundling (and are distinct from call forwarding functionality). Administrative costs will be recovered through the margins between direct costs and rates charged for Remote Call Forwarding.